

# On-Site Treatment by Generator

Under certain conditions generators may treat their own wastes on site without a permit. When generators choose to treat their own waste, it is called *treatment by generator* or TBG. Treatment is done to make wastes less hazardous, non-hazardous, or easier and safer to transport.

In spring 2011, the Hazardous Waste and Toxics Reduction Program (HWTR) *Treatment by Generator (TBG) Technical Information Memorandum*, publication #96-412, was modified to prohibit small quantity generators (SQGs) from treating waste on site. Only medium and large quantity generators are allowed to do TBG. Current TBG guidance states that SQGs treating their waste on site lose their conditionally exempt status and become subject to full dangerous waste regulation and must report as medium quantity generators.

This change impacted hundreds of SQG businesses, such as medical/dental laboratories and school chemistry classroom settings, who often treat wastes in very small quantities using safe and effective methods. Laboratories for example, are uniquely qualified to treat some of their wastes to eliminate their hazards or reduce the amount of waste needing disposal, thereby cutting costs.

**Upon further discussion and coordination with local hazardous waste programs, HWTR has decided to allow SQGs to perform TBG and keep their conditionally exempt status on an interim basis, effective immediately.**

Ecology expects businesses to follow best management practices, ensuring workplace safety as they accumulate and treat dangerous waste as identified in the technical information memorandum. When Ecology hazardous waste inspectors encounter SQGs conducting TBG activities, they will evaluate their practices on a case-by-case basis. Inspectors will use their discretion to determine if more stringent requirements should apply to the business if a facility is doing a poor job of waste management.

Ecology recommends that individual departments within a college or university setting that want to conduct TBG activities, contact their Environmental, Safety, and Health Coordinator to inquire about regulatory requirements.

For more information, contact your local Ecology Regional Office.

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Most Common TBG Activities	Best Management Practices for TBG Activities	References
<p><b>Elementary Neutralization:</b> This treatment can only be used on wastes that are regulated solely because they exhibit the characteristic of corrosivity from either having a pH of less than or equal to 2.0, or greater than or equal to 12.5.</p> <p>If the aqueous waste carries any additional listed, process, or characteristic hazardous waste codes other than "characteristic corrosive," it cannot be neutralized and disposed of to the sanitary sewer. Instead, it must be managed as a hazardous waste.</p> <p><b>Evaporation:</b> This treatment is only used for inorganic waste mixed with water. Use secondary containment for the evaporator to contain potential spills. Designate and dispose of remaining sludge properly.</p>	<p><b>Tracking of TBG Activities:</b> Written logs of all dangerous waste treated must be kept on site, including the date of treatment and the amount of each dangerous waste treated.</p> <p><b>Disposal of treated solutions:</b> Check with your local publicly owned treatment works (POTW) to determine if treated waste can be disposed of in the sanitary sewer system, and if so, at what concentration. <b>Do not discard treated wastes into septic systems.</b></p>	<p><b>Treatment by Generator</b> online at <a href="http://www.ecy.wa.gov/programs/hwtr/manage_waste/treatment_by_generator.html">http://www.ecy.wa.gov/programs/hwtr/manage_waste/treatment_by_generator.html</a></p> <p><b>Treatment by Generator fact sheet</b>, Ecology publication, #96-412 (revised May 2011) provides guidance for treating wastes on site. Please note the regulatory interim status change concerning small quantity generator treatment requirements as stated above. It is available online at <a href="https://fortress.wa.gov/ecy/publications/SummaryPages/96412.html">https://fortress.wa.gov/ecy/publications/SummaryPages/96412.html</a>.</p> <p>To request a <b>site ID number</b> or notify <b>Ecology</b> of TBG or other dangerous waste activities, use the form at <a href="https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070133.html">https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070133.html</a>.</p> <p>For a quick <b>checklist of dangerous waste requirements</b> for regulated generators, go to <a href="https://fortress.wa.gov/ecy/publications/SummaryPages/9112b.html">https://fortress.wa.gov/ecy/publications/SummaryPages/9112b.html</a>.</p>